Case 2:25-mj-30187-DUTY ECF No. 1 Page 10 1 Filed 03/27/25 Page 1 of 6 226-9100 (313) 226-9100

AO 91 (Rev. 11/11) Criminal Complaint Special Agent: Sherri Reynolds Telephone: (313) 202-3400

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

	Eastern Bistrict of i	viiioiiigaii			
United States of America					
v. Dylan Davis		Case No.			
	CRIMINAL COM	PLAINT			
I, the complainant in this case, state	that the following is tru	e to the best	of my knowledg	ge and belief.	
On or about the date(s) of				Wayne	in the
Code Section 21 U.S.C. § 841(a)(1)	Possession of a co substance.	Offense Desc ntrolled substa	•	distribute a contr	rolled
This criminal complaint is based on See attached affidavit.	these facts:				
Continued on the attached sheet.		Si	Complainant's si		
		Sl	nerri Reynolds, Sp	pecial Agent	

Date: March 27, 2025

Sworn to before me and signed in my presence

and/or by reliable electronic means.

City and state: Detroit, MI

Hon. Elizabeth A. Stafford, U.S. Magistrate Judge
Printed name and title

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Sherri Reynolds being duly sworn, hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since December of 2009. I am currently assigned to the Detroit Field Division. I completed twenty-six weeks of training, which was comprised of the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I received extensive training on firearms identification, common scenarios involving illegal firearms possession and firearms trafficking. Throughout my career, I have investigated or have been involved in hundreds of investigations that involve individuals who are felons in possession of firearms.
- 2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, police officers, informants and witnesses. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all of facts known to law enforcement related to this investigation.
- 3. This affidavit is made in support of a criminal complaint charging Dylan DAVIS, a convicted felon—with possession of a controlled substance with

intent to distribute narcotics in violation of Title 21 U.S.C § 841(a)(1) on March 26, 2025.

SUMMARY OF THE INVESTIGATION

- 4. On March 26, 2025, at approximately 6:47 p.m., Detroit Police Officers were on patrol in the 9th precinct in Detroit, MI near the intersection of Houston Whitter and Hayes. While on patrol, officers observed a gray Jeep Cherokee with the Texas license plate VMG47 parked across the sidewalk, which interfered with the pedestrian flow of traffic. The driver of the vehicle exited the vehicle and approached the door of a residence. At this time, the Detroit Police Department police vehicle, which was fully marked, stopped and activated its emergency lights directly in front of the Jeep. Officers then exited the vehicle and began to approach the Jeep.
- 5. As Officer Drake approached the vehicle, he observed two additional individuals in the vehicle. A front passenger who was wearing a ski mask and a rear passenger, who was later identified as Dylan DAVIS. As the officers advanced, DAVIS used his right hand and appeared to put an unidentified object in his pants near his groin area. When the officer got to the rear window, which was down, he was able to see DAVIS continuing to put an unidentified object in his pants. DAVIS's furtive gestures caused concern for the officers' safety. Both the front passenger and DAVIS were removed from the vehicle at this time.

- 6. DAVIS was searched and a clear plastic bag containing a hard crystalized substance was located in his pants, near his groin, where the officers observed DAVIS attempting to conceal the object. The driver of the vehicle was provided a ticket for blocking pedestrian traffic and he, the front passenger and the Jeep were released on scene. DAVIS was arrested and transported to the Detroit Detention Center. DAVIS is currently on three years' supervised release for distribution of controlled substances. His federal supervision commenced about one year ago.
- 7. Officers from the narcotics unit at the Detroit Police Department took custody of the suspected narcotics and conducted a presumptive test on it, which tested positive for methamphetamine. The methamphetamine was weighed by Detroit Police Officers, in the original packaging, which was a clear plastic bag and it weighed approximately 29 grams. On March 27, 2025, officers from the Detroit Police Department conducted an interview, *post-Miranda*, with Dylan DAVIS. During the interview, DAVIS stated he did intentionally hide the narcotics in his pants and that he was aware that it was narcotics.
- 8. A review of the criminal history for Dylan DAVIS showed that DAVIS has the following felony convictions:
 - Eastern District of Michigan 11/15/2019- Conspiracy with intent to distribute narcotics.

- Eastern District of Michigan 11/15/2019- Distribution of a controlled substance.
- 21st Judicial Court of West Virginia 01/15/2020- Possession with intent to sale/deliver narcotics.
- 9. The amount of controlled subsances, the absence of any of use paraphernalia, DAVIS's prior criminal convictions for drug trafficking, along with my training and experience, all suggest that DAVIS possessed the methamphetamine with the intent to distribute it.

CONCLUSION

10. Based on the above information, probable cause exists that Dylan

DAVIS, a convicted felon—with possession of a controlled substance with intent

to distribute a controlled substance (a mixture or substance containing

methamphetamine) in violation of Title 21 U.S.C § 841(a)(1) on March 26, 2025.

In consideration of the foregoing, I respectfully request that this Court issue a

complaint against Dylan DAVIS for violation of Title 21 U.S.C § 841(a)(1).

Respectfully Submitted,

Sherri Reynolds, Special Agent Alcohol, Tobacco, & Firearms

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. Elizabeth A. Stafford

United States Magistrate Judge

Date: March 27, 2025